

FREEPAGE CORPORATION RECEIVED

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November 4, 1997

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Secretary
Federal Communications Commission
1919 "M" street NW
Washington, DC 20554

Gentlemen:

Attached please find an original and four copies of COMMENTS OF
FREEPAGE CORPORATION in response to the notice of inquiry
WT Docket 97-207.

Sincerely,



Matt Edwards
President

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ORIGINAL

Before the
Federal Communications Commission
Washington, DC 20554

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NOV - 7 1997

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In the Matter of)
Calling Party Pays Service Option)
in the Commercial Mobile Radio)
Services)

WT Docket 97-207

COMMENTS OF FREEPAGE CORPORATION

INTRODUCTION

1. FreePage Corporation is the licensee of a number of Domestic Public Mobile Stations providing mobile and paging services, including KNLR969 in New York City. We also contemplate becoming a wireless reseller.
2. The Company recently changed its corporate name to FreePage Corporation to reflect its re-direction into Calling Party Pays ("CPP") services. The Company is currently modifying its New York facilities to permit CPP services. It stands to be adversely affected by Commission actions which limit its ability to offer its special version of CPP services.
3. The Commission, in recognition of several CPP offerings already underway, has now opened the instant Inquiry to review possible regulatory changes to assist in the implementation of CPP.

DISCUSSION OF PAGING CPP

4. FreePage will shortly offer CPP paging service in New York City using a an entirely different form of CPP than other firms now utilize. Currently, the other CPP paging offerings underway by various carriers rely on the LEC to provide a "block" of individual access numbers which are part of the CPP program. These are referred to as DID ("direct inward dialling") trunks, and usually result in a paging company being assigned an entire Central Office exchange (NXX)(10,000 numbers), which terminates at the paging company's terminal. Each subscriber is assigned a separate access number. It becomes easy for the LEC to assign a special rate plan for calls made to that exchange. Number portability is more easily addressed, as well.

5. We however, have accelerated the introduction of CPP for our potential users by negotiating to use "Interactive" lines from the LEC. While these Interactive service offerings have heretofore been associate with "sex" lines and the like, the reality is that they are also used for a wide range of other services, including Lotto results, weather, sports scores, news, financial information, and the like.

In the New York City metro region, the LEC has actually divided the Interactive offerings into two separate exchanges, 976 and 540, depending on content. We will be utilising the 540 exchange for our offerings, with further end-to-end signalling to identify the specific pager with a PIN (Personal Identification Number). Our customers share a common access line, and then "overdial" to address the specific pager.

6. While we are addressing a specific "market niche" by offering voice paging (usually referred to as "tone and voice") , and therefore are limited to about 1200 subscribers per radio channel, we fear that we may be forced into using regular CPP numbers unless the Commission provides for continued service offerings such as ours. Should we be forced to utilise CPP numbers instead of Interactive lines, we would have to purchase new equipment, the cost of which could not be justified by our limited subscriber base.

7. Further, we are concerned that Number Portability issues (which are not directly a part of the agenda for this Inquiry, but interrelated with it) may create an impossible barrier for us, and other similarly situated carriers, to overcome. Because we use the Interactive service offering from the LEC as the basis of our business, we stand to be regulated out of business because our system architecture does not lend itself to Number Portability.

MOBILE SERVICES

8. CPP, when associated with two-way services, offers the potential of reducing the mobile subscriber' monthly bills, which may result in more wireless subscribers. However, the revenue impact to the wireless carriers is actually minimal, as they simply collect about the same amount of revenues, but separately from two sources. Our concern, as a potential reseller of wireless services, is that the carriers may use this structural separation in a way that will make it impossible for Wireless Resellers to compete in the marketplace.

9. Wireless Resellers are currently ineligible for direct CPP services from LECs, so that the wireless carriers whose services they resell could presumably offer a greater range of billing options to subscribers than could resellers . Unless the Wireless Resellers are included in the Commission's overall CPP agenda, the competitive marketplace will diminish. Making an effort to include the resellers in overall wireless picture will enhance the variety of services available to the public. One way to insure this is to make sure that CPP numbers are available to Wireless Resellers.

10. As CPP offerings proliferate, it may develop that CMRS providers will no longer maintain subscriber lists. The Commission should address this possibility by reviewing the regulations which require carriers to maintain and identify their subscribers, if only for determination of the annual fees paid to the Commission.

CONCLUSION

11. We welcome the instant Inquiry, and urge the Commission to act to protect new and incumbent CMRS users of Interactive services, by exempting such Licensees from Wireless Number Portability requirements, and by recognition of the fact that many forms of CPP may develop over time.

12. We are most concerned that unconventional methods (such as ours) of providing CPP services may be limited or otherwise unprotected in the Commission's new regulations; we are also concerned that LECs may use this new forum to deny CMRS carriers access to unconventional methods of providing CPP services to their users.

Respectfully submitted,

FreePage Corporation

by: 

Matt Edwards, President